

THE FRESH START

A Periodic Newsletter from the United States Trustee Offices for Region 11
Wisconsin and the Northern District of Illinois

WINTER 2003

TABLE OF CONTENTS

<i>Violet Forrest</i>	1
<i>From The Desk of our U.S. Trustee</i>	1
<i>National News</i>	2
<i>News from Region 11</i>	2
<i>Recent Region 11 Prosecutions</i>	5
<i>Recent Court Decisions</i>	7
<i>Notable Cases Recently Filed</i>	7
<i>Civil Enforcement Actions</i>	8
<i>Electronic Case Filing</i>	10

This edition of the Fresh Start is dedicated to the memory of Violet Forrest who passed away September 12, 2002.

Violet worked as a paralegal for many years in the Chicago office. Following is an excerpt from the comments by former United States Trustee M. Scott Michel at the presentation of the United States Trustee Program's Special Career Achievement Award to Violet. "Violet literally turned the key on October 1, 1979 to open the Chicago pilot office. Working conditions and staffing levels were less than ideal and overall national policy coordination was, at best, minimal. Under the leadership of now District Court Judge David Coar, Violet developed a case assignment system with the Bankruptcy Clerk's Office, a trustee calendar assignment procedure, and

a blind rotation system for converted Chapter 11 cases. Many of the procedures she developed are still utilized in our current operations. Her loyalty and devotion to the Chicago office and the program has been exemplary and is demonstrated by her continuing service as a volunteer since early retirement in 1994. The Chicago office has been fortunate to have Violet as an employee for the last 18 years. And I'm proud to be able to have her receive this special Director's Award for Career Achievement. Thank you Violet for all you have done." *Everyone who knew Violet has different memories of her, but we all remember a spunky woman who did not just sit quietly in a chair in her later years. Violet did not let age get in the way of her treasured activities, including being an accomplished musician. We look to Violet as an example of living a full, rich life at any age.*

From the Desk of our **U.S. Trustee**

During this Holiday Season we should all take a few minutes to consider all that has occurred in the past year and all the things that we are thankful for. Too often we lose sight of the things that are really important in the rush of the Holidays. I am thankful for my wonderful family and the constant love and support that they provide me. I am also thankful for the

opportunity to serve as United States Trustee for Region 11. In that capacity I have been fortunate to work with an outstanding and dedicated group of employees. I am proud of the work we do every day in serving the public and doing our best to ensure that the bankruptcy process is open and honest. I am confident that in the coming year we will continue to serve at the highest level of professionalism. I wish you and yours a Happy Holiday Season.

National News

On September 26, 2002, Lawrence Friedman, Director of the Executive Office for United States Trustees (EOUST), senior staff from EOUST and all United States Trustees held a meeting in Chicago. The meeting agenda covered a variety of issues such as civil and criminal enforcement, Chapter 11 issues, pending legislation, budget and personnel, automation, training, trustee oversight and the debtor audit pilot project.

On October 3, 2002, Mr. Friedman participated in a panel discussion at the 76th annual meeting of the National Conference of Bankruptcy Judges held October 2-5 in Chicago. Among the topics discussed were director and officer liability, current developments in hot and emerging areas of bankruptcy law, and cash collateral and debtor-in-possession financing issues.

News from Region 11

During the summer, the Milwaukee office said goodbye to Assistant United States Trustee (AUST) John Byrnes, who left to become AUST in Roanoke, Virginia. Trial

Attorney David Asbach was selected as the new AUST.

In May Director Lawrence Friedman awarded the Chicago office the Director's Award for Exceptional Achievement in Civil Enforcement. Mr. Friedman had an opportunity to meet the Chicago staff when he presented the award on July 1, 2002.

During the summer, the Chicago office was fortunate to have the assistance of two legal interns, Liza Murcia, attending Northwestern Law School, and Brian Oleniczak, who was attending Wayne State University Law School in Michigan, but has since transferred to De Paul Law School here in Chicago.

During June, Bankruptcy Analyst Robert Wakefield attended Mediation/Negotiation Training at the National Advocacy Center (NAC), Columbia, South Carolina. Financial Analyst Henry Moore attended this same course in October.

On June 5, 2002, civil enforcement training was held for the Chicago area Chapter 13 trustees, hosted by Chapter 13 trustee Marilyn Marshall.

For the 12 month period ending June 30, 2002, 32,888 Chapter 7 cases were filed in the Chicago area, more than any other bankruptcy court district in the country. For the 12 month period ending September 30, 2002, Region 11 experienced an overall increase in total case filings of 15.3%. Included in that increase were an 88% increase in Chapter 7 filings in Madison and a 62% increase in Chapter 11 filings in Chicago.

On July 1, 2002, Kenneth Gardner, Clerk of the Bankruptcy Court for the Northern District of Illinois, and his staff demonstrated electronic filing (ECF) for some USTO staff. This same demonstration was repeated in October for the rest of the our staff.

In July, 2002, Milwaukee's Paralegal Specialist Jacqueline Grasse was nominated for the Attorney General's Award for Excellence in Legal Support.

Two new employees joined the Chicago office in July. Trial Attorney Gretchen Silver transferred from the Securities and Exchange Commission, and Legal Clerk Patty Brasier formerly worked at a law firm.

During the week of August 12, 2002, AUST Sandra Rasnak was an instructor at Trial Advocacy Training at the NAC. Paralegal Specialist Jennifer Conrad and Bankruptcy Analysts Robert Wakefield and Alfreda Baran served as witnesses in mock bankruptcy trials designed to help USTO attorneys sharpen their litigation skills.

On September 1, 2002, John Cirilli was appointed to the panel of Chapter 7 trustees for the Western District of Wisconsin.

During the week of September 16, Gretchen Silver attended Civil Enforcement Training training at the NAC.

On October 2, 2002, Sandra Rasnak spoke on credit card and business bust-outs during a presentation to Federal Bureau of Investigation Special Agents in Charge and white collar financial crime supervisors

attending a conference at Quantico, Virginia. The panel focused on how bust-outs are used as a funding tool for a variety of criminal enterprises, including the potential for their use by terrorist organizations, and also discussed credit card bust-outs actions underway in several districts.

The General Services Administration extended the Chicago lease for three years. Great news for those of us who work here.

On October 13, 2002, Trial Attorney Steve Wolfe ran the Chicago Marathon for the sixth time. A rumor is circulating that Keith Manikowski, Information Technology Specialist, will join Steve for the 2003 run.

On October 23, 2002, Steve Wolfe and Chapter 7 trustee Joe Cohen participated in a Consumer Bankruptcy Workshop presented by the Chicago Bar Association (CBA).

Milwaukee recently had a baby explosion. We congratulate Carrie Baumgardt and Jannette Florczak on their new baby girls.

On October 24, 2002, UST Ira Bodenstein participated in the Chicago Public School's Principal for a Day Program. Mr. Bodenstein was principal at Waters Elementary School.

On November 1, 2002, the Madison office held its annual training for Chapter 7 panel trustees for the Western District of Wisconsin. Ira Bodenstein attended the meeting, which included a presentation on electronic case filing by Kenneth Gardner, Clerk of the Bankruptcy Court for the Northern District of Illinois.

Region 11 conducted a Chapter 13 Standing Trustee Regional Meeting in Rockford, Illinois on November 6 and 7, 2002. In attendance were Standing Chapter 13 Trustees from the Northern District of Illinois and the State of Wisconsin along with representatives from their offices; Honorable Margaret McGarrity, United States Bankruptcy Court for the Eastern District of Wisconsin, and Honorable John Squires, United States Bankruptcy Court for the Northern District of Illinois; Kenneth Gardner and representatives from the Bankruptcy Clerk's office; a representative from the EOUST; and Ira Bodenstein and Region 11 staff. Presentations were made on a variety of topics including: the Chapter 13 model plan; civil enforcement; expectations of a standing trustee's office; standing trustee duties; electronic case filing; effective communications; updates from EOUST; and case law. The event was hosted by Ira Bodenstein and Lydia Meyer, Standing Chapter 13 Trustee in Rockford, the host city, and coordinated by Howard "Chip" Wilkes, Senior Bankruptcy Analyst and Standing Chapter 13 Coordinator for Region 11.

On November 5, 2002, UST Ira Bodenstein addressed the CBA's Young Lawyers Section Bankruptcy Committee on the role of the U.S. Trustee and on November 12, 2002, UST Ira Bodenstein addressed the CBA Main Bankruptcy Committee on Chapter 11 issues.

Two Chicago employees were recently honored at the November Manager's Conference in Santa Monica, California.

Trial Attorney Katy Gleason was awarded a Director's Award for Excellence in Legal Advocacy. When nominating Katy Gleason, Ira Bodenstein mentioned her efforts in large reorganization proceedings; the civil enforcement area; her efforts in addressing financing issues, committee formation issues, issues involving disinterestedness, and indemnification. Katy was also cited for her effectiveness in combating systems abuse problems involving consumer practitioners; and her success in investigating and prosecuting actions against practitioners who prey on unsuspecting debtors; and obtaining and enforcing disgorgement and injunctive relief against these individuals. Keith Manikowski was awarded a Director's Award for Administrative Support, part of a group award given to five people who worked on testing enhancements to the USTO's case management system.

On November 14, 2002, the Milwaukee office held its annual training for Chapter 7 panel trustees for the Eastern District of Wisconsin. Ira Bodenstein attended the meeting which included presentations by Honorable Russell A. Eisenberg, Chief Bankruptcy Judge of the United States Bankruptcy Court for the Eastern District of Wisconsin, on the state of the court, and Chris Austin, Clerk of the Bankruptcy Court for the Eastern District of Wisconsin, on electronic case filing.

On December 7, 2002, UST Ira Bodenstein spoke on a panel discussing indemnification of professionals at the American Bankruptcy Institute (ABI) Winter Leadership Conference in Tucson, Arizona.

Recent Region 11 Prosecutions

On May 21, 2002, a jury found **Ernesto G. Mutuc** guilty of bankruptcy fraud and perjury. Mutuc, a technical consultant for a software design company, failed to disclose the sale and transfer of funds resulting from sale of stock, and lied about a condominium purchase on the petition and in a deposition under oath.

On May 30, 2002, **Gary L. Mingle** entered a guilty plea after an information charged him with one count of concealing assets. Mingle, who owned an industrial equipment leasing business, was forced into bankruptcy by creditors. After the bankruptcy filing, Mingle concealed \$50,000 of savings bonds, and also concealed a Mercedes worth \$50,000 by retitling it in the name of a fictitious company, using it as his personal vehicle. Sentencing has been set for February 19, 2003.

On May 31, 2002, **Andre Brown** was sentenced to 15 months imprisonment, and two years supervised release after pleading guilty to one count of bankruptcy fraud. Brown used his position as a mortgage loan broker to obtain mortgages for properties he purchased for himself using his deceased uncle's name, *Clyde Merrill*. Brown failed to disclose filing five prior bankruptcies under his own name. Brown filed three bankruptcies as *Clyde Merrill* to halt foreclosure of the properties.

On June 4, 2002, **Angela N. Nash** was sentenced, after pleading guilty, to two

months imprisonment, and three years supervised release followed by 8 months home detention with electronic monitoring. Nash, using the name *Nicole D. Nash*, obtained a mortgage and refinanced her condominium, using a false social security number, identification, employment, and income information. She filed a Chapter 13 using the name *Nicole D. Nash* and a false social security number. After the first bankruptcy was dismissed, Nash filed two more bankruptcies using false information. Using a forged cashier's check deposited into her account, Nash wrote and cashed checks drawn on the account.

On July 10, 2002, a Chicago bankruptcy attorney was indicted for allegedly forging a bankruptcy judge's signature on bogus wage garnishment orders to fraudulently collect legal fees directly from clients' employers. **Michael G. Roberts** was charged with 10 counts of forging the signature of a federal judge and one count each of bankruptcy fraud, mail fraud and wire fraud. According to the indictment, Roberts engaged in this scheme by fraudulently garnishing the wages of over 35 clients for his legal services in filing their bankruptcy petitions. Roberts allegedly prepared false court orders providing for wage garnishment until his legal fees were fully paid. Roberts allegedly forged the signature of the judge assigned to his client's case to make the fraudulent orders appear legitimate and entered by the Court. Roberts would then mail or wire a copy of the order directly to the client's employer to begin the garnishment. Roberts has been disbarred effective November 26, 2002.

On August 6, 2002, **Ronda Payne** pleaded guilty to one count of bankruptcy fraud. Using false social security numbers, income and credit information supported by phony tax returns, Payne applied for consumer loans and automobile financing of \$50,000 obtaining personal property and cars. Payne filed two false bankruptcy petitions, using a false social security number and claiming no income. In the second bankruptcy, Payne concealed the prior bankruptcy, used a false social security number and provided false income information.

On August 16, 2002, **Gary L. France** was sentenced to 30 months incarceration, 3 years supervised release and restitution of \$800,000 after pleading guilty to mail fraud and bankruptcy fraud. In January 2000, France filed a bankruptcy petition omitting \$308,000 he received, and the transfer of \$100,000 to his wife and daughter within one year of his bankruptcy filing. During the first meeting of creditors, France testified that he had not transferred money over \$1,000 to any relative in the last four years. France was a dentist receiving disability payments of \$7,000 for 73 months from July 29, 1999 through August 7, 2005 for a lump sum total of \$350,000. Some of the money from these disability payments were transferred to France's brokerage account. France testified at the same 341 meeting that the last time he had any financial account had been 2 or 3 years ago. As part of the same information, France pleaded guilty to fraudulently billing Blue Cross/Blue Shield for dental procedures not performed; not performed on the listed patient; or not performed on the date listed on the form. Chapter 7 trustee Michael

Berland's thorough examination of France at the 341 meeting greatly assisted the postal inspectors and the United States Attorney's Office in building their case.

On September 25, 2002, **Richard N. Golding** was sentenced to three years probation, a \$5,000 fine and restitution of \$503, after pleading guilty to criminal contempt. Golding, an experienced Chicago attorney with a substantial bankruptcy practice, operated an auction service used by Chapter 7 trustees. Golding disobeyed a court order directing him not to pay any compensation to his auction service without seeking court approval. Rather than promptly remitting the auction proceeds to the trustees as required in three cases, Golding deposited the funds into the auction service's bank account which delayed paying the trustees the money due to the estates, violating a direct order of the Bankruptcy Court.

On October 4, 2002, **Bakht Z. Kahn** was sentenced, after pleading guilty to concealment of assets, making a false oath, claims bribery and conspiracy, to twelve months imprisonment, three years supervised release and restitution of \$337,255. Kahn's case involved a credit card bust-out. Kahn perjured himself by maintaining that he lost more than \$100,000 while gambling, and concealed and failed to disclose a suburban residence where his wife and child resided, as well as diversion of cash to third parties.

On October 15, 2002, **Hasan Dervisevic** pleaded guilty to four counts, and his ex-wife **Martha Dervisevic** pleaded guilty to three counts, of concealment of assets, false oaths

and claims bribery. Both defendants filed separate bankruptcy petitions after their divorce. Both asserted owning no property, when Hasan Dervisevic owned a quarter interest in an apartment and commercial building damaged by an earlier fire in which Martha Dervisevic and another ex-wife each claimed an interest. Two weeks after filing bankruptcy Hasan Dervisevic transferred his interest in the building to Martha and both concealed their interests in this property. Sentencing is set for January 3, 2003.

In late November, **Donald Lee** was sentenced to six months home confinement, and five years probation. Donald W. Lee, a suspended attorney, was charged with a bankruptcy fraud scheme in which he accepted payments for legal services, representing himself as a licensed practicing attorney when he was suspended from the practice of law.

Recent Court Decisions

In re DEC Intern, Inc., 282 B.R. 423 (W.D. Wis. 2002). The debtor sought approval of an indemnification agreement with KPMG, its investment banker. The bankruptcy court approved the agreement and the UST appealed the decision. The UST argued that such agreements are *per se* unreasonable under 11 U.S.C. §328(a). The district court affirmed the bankruptcy court stating “[whatever reservations I might have about broad ranging indemnification agreements, I cannot say that they are unreasonable as a matter of law.” *DEC* at 429. While affirming the bankruptcy court, the district court expressed concern about routinely

authorizing indemnification in bankruptcy cases. It found “something distinctly unpalatable about the idea of indemnifying a professional advisor for its own negligence.” *DEC* at 426. The district court further cautioned that “such agreements should [not] be accepted without close examination by the bankruptcy court [and] the proponents of such agreements should ... be required to show that the provisions are reasonable in the circumstances of the particular bankruptcy proceeding.” *DEC* at 429.

Notable Cases Recently Filed

On October 15, 2002, convenience store company Clark Retail Group filed for Chapter 11 protection. Company representatives blamed steep declines in gasoline margins, a weak economy, decreased consumer spending after September 11, 2001 and intense competition for its financial condition. Clark’s White Hen Pantry subsidiary, a convenience store chain in the Chicago area with 250 outlets, was excluded from the filing

UAL Corp., the parent company of United Airlines, filed Chapter 11 bankruptcy in the Northern District of Illinois on December 9, 2002, in the largest airline bankruptcy case ever filed. On December 9, the UST and Chicago staff participated in a 7:00 a.m. hearing on bridge financing and an 11:00 a.m. hearing on 54 first-day motions, many of which the UST had already negotiated with the debtor to have continued to a later hearing. On December 13, the UST presided at the meeting to form an unsecured creditors’ committee. The filing by UAL listed \$22.8 billion in assets and \$21.2 billion in liabilities.

United is the nation's second-largest airline, with over 80,000 workers worldwide who own 55 percent of the company. Reasons cited for the Chapter 11 filing included over \$2 billion in losses for 2001, labor costs, and failure to secure a loan guarantee from the Air Transportation Stabilization Board.

On December 17, 2002, finance company Consecro, Inc., filed for Chapter 11 protection in the Northern District of Illinois. This is currently the third-largest bankruptcy in U.S. history, after WorldCom and Enron, based on \$52.3 billion in assets reported by the company and its subsidiaries as of September 30, 2002.. The bankruptcy does not include Consecro's insurance operations.

Civil Enforcement Actions

In October 2001, the United States Trustee Program launched an initiative to more aggressively use civil enforcement remedies to address abuses of the bankruptcy systems such as petition preparer abuse, credit card abuse, substantial abuse under 707(b), attorney conduct, and other similar problems. The Chicago office has been aggressive and effective in these areas. As part of our effort to detect abuses, in addition to helpful insights from panel trustees and the bankruptcy community, the USTO independently screens every Chapter 7 petition for potential problem cases. Those cases which have indicia of problem or abuse patterns are identified, and frequently staff members attend the first meeting to obtain more information. For collar county cases in which it is not cost effective for our staff to travel to attend one meeting, the panel

trustees may be asked in advance to report back to our staff about a particular case following the first meeting.

In the more egregious credit card abuse cases, we have been issuing subpoenas to the credit card issuers, along with document requests and oral examinations of the debtor pursuant to Bankruptcy Rule 2004. Through our discovery and with the assistance of our panel trustees, we have encountered several troubling fact patterns. In one group of cases, debtors take large cash advances and "invest" them in out of town "businesses". In these cases, the "business" typically was a cash basis business, no records were ever kept, and/or the debtor was somehow "misled" into this venture. While documents from the credit card issuers may support the cash advances, they do not provide any help as to what the debtor really did with the money. In another group of cases, referred to as bust-outs, the debtors typically establish and maintain credit over a period of time, frequently making large payments on credit cards to pay off significant balances. The debtors then send in full payments, typically by personal checks, to several credit card issuers. The credit card issuers give immediate credit to the account, which frees up new credit availability. The debtors then go on a shopping spree, running the cards back to the limits typically with purchases of electronics or other high value, transferable goods as well as cash advances. The purchases are all made in the two to three day window before the checks are returned for insufficient funds. When the dust settles, the debtors' balances are effectively double their credit card limits. Cases in this profile

typically show very high credit card debt, and little if any income together with little if any assets - that is, there are no apparent explanations for how such a low income individual established such high credit limits, how this individual thought he could ever re-pay this credit card debt, or what the individual purchased.

In the 707(b) area, while we do not prosecute a high volume of these cases, we have progressed in this area. This past August, Judge Coar of the United States District Court for the Northern District of Illinois adopted the "totality of the circumstances" test (applied by the First, Fourth, Sixth and Tenth Circuits) in the case of *In re Costello*, 2002 WL 1821663 (Aug. 7, 2002) (affirming Judge Barliant's dismissal as substantial abuse where debtors each were driving new luxury SUVs). (See *Costello* discussion.) In another case referred by panel trustee Charlie Myler, the debtors had annual income of approximately \$150,000, were paying down their \$225,000 mortgage on a 15 year amortization, leased two luxury vehicles, and were saving approximately \$500 monthly into a pension account. With these circumstances, we felt it was an abuse for these debtors to discharge approximately \$200,000 in credit card debt, and UST Trial Attorney Roman Sukley successfully forced these debtors into Chapter 13.

Petition Preparers

Corey Henderson was permanently enjoined from being a petition preparer in the Northern District of Illinois. In at least three Chapter 7 cases, Henderson was fined by the

Court for illegally handling court fees, or held in contempt for failure to return excessive fees or for failure to appear at a prior court date.

§707(b)

Costello v. Bodenstein, 2002 WL 1821663 (N.D. Ill.). This is the first appellate decision on 11 U.S.C. §707(b) in the Northern District of Illinois. The joint debtors, Patrick L. Costello and Linda H. Montoya-Costello, owned two 1998 Ford Expeditions with combined monthly payments of \$1,175. Immediately prior to filing bankruptcy, the debtors traded their vehicles for two new Expeditions with combined monthly payments of \$1,365. Besides the two vehicles, the Costellos listed \$40,000 in credit card debt on their Chapter 7 petition. The Costellos' excess combined monthly income after expenses was \$626.75. The UST filed a Motion to Dismiss which the Costellos appealed. The district court adopted a broad "totality of the circumstances" test, giving deference to the bankruptcy court's analysis. The decision cited several factors the Fourth Circuit enumerated: (1) whether the debtor has the ability to repay; (2) whether the petition was filed "because of sudden illness, calamity, disability, or unemployment"; (3) whether the debtor "incurred cash advances and made consumer purchases far in excess of his ability to pay"; (4) whether the debtor's "proposed family budget is excessive or unreasonable"; (5) whether the debtor's schedules and statement of current income and expenses "reasonably and accurately reflects his true financial condition"; and (6) whether the petition "was filed in good faith." *In re Green*, 934 F.2d 568, (4th Cir. 1991). The district

court affirmed the Bankruptcy Court's dismissal of this case for substantial abuse.

Denial of Discharge

The Chicago USTO investigated a joint Chapter 7 case with debts totaling \$427,216 in which the husband debtor was ineligible to receive a discharge under 11 U.S.C. §727(a)(8) because he received a previous discharge within six years before filing this case. Based on the UST's actions, the Bankruptcy Court denied discharge.

On December 5, the Bankruptcy Court granted the UST motion to deny Chapter 7 discharge to Peter Fernandez, Jr. preventing discharge of \$290,234 in scheduled debts. Fernandez, whose firm was architect for the Village of Lyons, Illinois, was indicted prepetition on charges relating to a bid-rigging scheme. When Fernandez filed bankruptcy, he failed to disclose his bid-rigging profits. Following trial, the bankruptcy court kept the matter under advisement pending Fernandez' appeal of his conviction. After Fernandez exhausted his appeals, the U.S. Trustee submitted revised findings and conclusions to the bankruptcy court.

ELECTRONIC CASE FILING COMING SOON!!

Electronic Case Filing will commence this coming spring in the Northern District of Illinois. CM/ECF, as it is commonly called, has two components, case management and electronic case filing. Case Management is an internal system which will allow the bankruptcy court to manage its cases and is not accessible to the general public.

Electronic Case Filing will allow attorneys and trustees to file and view documents from their office, home or anywhere they have access to the Internet. Under this system, documents can be filed electronically, and when this is done, the documents are automatically docketed as part of the filing process. The Bankruptcy Court has established a Main ECF Committee, chaired by Chief Judge Wedoff, as well as numerous sub-committees to establish a smooth transition into the electronic filing era. The United States Trustee's Office is active on the Main ECF Committee as well as the Rules Sub-Committee. The current plans are to allow for optional electronic filing beginning in the Spring 2003 and to work toward mandatory electronic filing in a year or so thereafter. The Bankruptcy Clerk's Office has been extremely helpful in providing overview sessions for UST personnel, Chapter 13 trustees and the chapter 7 panel members. All parties, including attorneys and trustees, will be required to go through specific training sessions in the next few months in order to obtain a password which will permit them to file documents electronically. The Bankruptcy Clerk's Office has developed excellent tutorials, which can be accessed at the court's website @ www.ilnb.uscourts.gov. The website contains links to other districts which already are using CM/ECF.

For more information about this newsletter, or for additional copies, please contact: Alfreda Baran, Bankruptcy Analyst, USTO, 227 West Monroe, Suite 3350, Chicago, Illinois 60606, (312) 886-5785, or email: alfreda.baran@usdoj.gov